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15 UNITED STATES BANKRUPTCY COURT

16 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION
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18 In re
19 THE ROMAN CATHOLIC ARCHBISHOP
20 OF SAN FRANCISCO,

21 Debtor and
22 Debtor in Possession.
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Case No. 23-30564

Chapter 11

**NOTICE OF HEARING ON DEBTOR'S
SECOND MOTION FOR EXTENSION OF
DEADLINE FOR REMOVAL OF CIVIL
ACTIONS [28 U.S.C. § 1452 AND
BANKRUPTCY RULE 9027]**

Date: May 16, 2024
Time: 1:30 p.m.
Location: Via ZoomGov
Judge: Hon. Dennis Montali

1 **NOTICE IS HEREBY GIVEN** that The Roman Catholic Archbishop of San Francisco,
2 debtor and debtor-in-possession herein (“Debtor”), has filed a *Second Motion for Extension of*
3 *Deadline for Removal of Civil Actions* (the “Motion”) and that a hearing on the Motion is scheduled
4 on May 16, 2024, at 1:30 p.m. at the United States Bankruptcy Court, Northern District of
5 California, San Francisco Division, before the Honorable Dennis Montali (the “Hearing”). The
6 Hearing will not be conducted in the presiding judge’s courtroom but instead will be conducted by
7 videoconference via ZoomGov. The Bankruptcy Court’s website provides information regarding
8 how to arrange an appearance at a video or telephonic hearing. If you have questions about how to
9 participate in a video or telephonic hearing, you may contact the court by calling 888-821-7606 or
10 by using the Live Chat feature on the Bankruptcy Court’s website. The link to the judge’s electronic
11 calendar is: <https://www.canb.uscourts.gov/judge/montali/calendar>.

12 **NOTICE IS FURTHER GIVEN** that the Motion is supported by the *Declaration of*
13 *Joseph J. Passarello in Support of Chapter 11 Petition and Debtor’s Emergency Motions* [ECF
14 14], the *Declaration of Paul E. Gaspari in Support of Chapter 11 Petition and Debtor’s Emergency*
15 *Motions* [ECF 15], the pleadings and papers on file in this case, and such other evidence and
16 argument as may be submitted before or during the hearing on the Motion.

17 As noted in the Gaspari Decl. and Passarello Background Decl., the Debtor is informed and
18 believes that approximately 537 complaints have been filed in the Joint Coordinated Proceeding
19 No. 5108 pending in Alameda Superior Court, although the RCASF has not been served with all
20 of them yet. The Debtor has filed its Schedules and Statement of Financial Affairs identifying
21 each of the actions of which the Debtor was aware as of the initial schedules filing date of
22 September 21, 2023. *See* ECFs 152 and 153. The Debtor may become aware of other complaints
23 hereafter (such actions, together with any other civil action to which the Debtor is, or may become,
24 a party, collectively, the “Civil Actions”). By the Motion, the Debtor is requesting the Court to
25 enter an order pursuant to 28 U.S.C. § 1452 of title 11 of the United States Code and Bankruptcy
26 Rules 9027 and 9006 extending the deadline by which the Debtor may file notices of removal
27 under Bankruptcy Rule 9027(a) for the Civil Actions by 180 days from May 23, 2024, to
28 November 19, 2024, without prejudice to further extensions.

1 **NOTICE IS FURTHER GIVEN** that this notice does not contain all the particulars of the
2 Motion or supporting documents, nor does it summarize all of the evidence submitted in support.
3 For further specifics concerning the Motion and the relief requested, you are encouraged to review
4 the Motion and the supporting evidence, including the supporting Declaration, copies of which may
5 be obtained from the website to be maintained by the Debtor's Claims Agent Omni Agent Solutions,
6 Inc., at <https://www.omniagentsolutions.com/RCASF>. You may also access these documents from
7 the Court's Pacer system (requires a subscription). The web page address for the United States
8 Bankruptcy Court for the Northern District of California is <http://www.canb.uscourts.gov>.

9 The Bankruptcy Court's website provides information regarding how to arrange a telephonic
10 or video appearance. Counsel, parties and other interested parties may attend the hearing in person
11 or by Zoom. Additional information is available on Judge Montali's Procedures page on the court's
12 website. If you have questions about how to participate in a video or telephonic hearing, you may
13 contact the court by calling 888-821-7606 or by using the Live Chat feature on the Bankruptcy
14 Court's website. The link to the judge's electronic calendar is:
15 <https://www.canb.uscourts.gov/judge/montali/calendar>.

16 **NOTICE IS FURTHER GIVEN** that any opposition or response to the Motion must be
17 in writing and filed with the Bankruptcy Court on or before May 2, 2024. Any opposition or
18 response must also be served on the counsel for the Debtor at the above-referenced addresses and
19 the Limited Service List as provided in the Final Order Approving Motion to Establish Notice
20 Procedures and to File Confidential Information Under Seal at ECF 227. The updated Limited
21 Service List may be obtained from the Omni Agent Solutions, Inc., website listed above. Failure
22 to file timely opposition and appear at the hearing may constitute a waiver of your objections. Your
23 rights may be affected. You should read these papers carefully and discuss them with your

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1 attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to
2 consult one.

3 Dated: April 18, 2024

FELDERSTEIN FITZGERALD WILLOUGHBY
PASCUZZI & RIOS LLP

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5 By: /s/ Jason E. Rios
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6 JASON E. RIOS
7 THOMAS R. PHINNEY

8 Attorneys for The Roman Catholic Archbishop of
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9
10 Dated: April 18, 2024

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